IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

NEIL F. LETREN,)
Plaintiff,)
v.) Civil Action No. 8:16-cv-03520-PX
JPMORGAN CHASE BANK, N.A.)
Defendant.)
)

JOINT INITIAL STATUS REPORT

Pursuant to this Court's November 3, 2016 Scheduling Order, Defendant JPMorgan Chase Bank, N.A. ("Chase") and Plaintiff Neil F. Letren jointly state as follows:

1. **Requests for Modification.** The parties do not request any modification to the discovery limits in the Scheduling Order. Plaintiff requests that all deadlines starting with the January 3, 2017 deadline for Plaintiff's Rule 26(a)(2) expert disclosures be pushed back 30 days:

Current Deadline	Plaintiff's Proposal	Event(s)
November 17, 2016	November 17, 2016	Rule 16 conference call at 10:30 a.m.
December 19, 2016	December 19, 2016	Motions to amend the pleadings or for joinder of additional parties
January 3, 2017	February 2, 2017	Plaintiff's Rule 26(a)(2) expert disclosures
February 1, 2017	March 3, 2017	Defendant's Rule 26(a)(2) expert disclosures
February 15, 2017	March 17, 2017	Plaintiff's rebuttal Rule 26(a)(2) expert
		disclosures
February 22, 2017	March 24, 2017	Rule 26(e)(2) supplementation of disclosures and
		responses
March 20, 2017	April 19, 2017	Completion of Discovery; submission of Post-
		Discovery Joint Status Report
March 27, 2017	April 26, 2017	Requests for admission
April 17, 2017	May 17, 2017	Dispositive pretrial motions

- 2. **Report on Consent to Proceed Before a United States Magistrate Judge.** The parties do not consent to proceed before a magistrate judge.
- 3. **Report on Mediation with a United States Magistrate Judge.** The parties do not currently anticipate participating in mediation before a magistrate judge.
- 4. **Report on the Scope of Discovery.** The parties will conduct discovery pursuant to the Federal Rules, the District of Maryland's Local Rules, and the Scheduling Order. The parties do not anticipate the need for any modification of the applicable limitations on discovery. Plaintiff will likely seek discovery relating to topics such as Chase's investigation into the credit-bureau disputes at issue in the Complaint. Chase will likely seek discovery relating to the allegations in the Complaint and Plaintiff's claimed damages.
- 5. **Request for a Case Management Conference.** The parties do not anticipate a need for a case management conference.

Dated: November 16, 2016

/s/ Alan Schoenfeld

Alan Schoenfeld (pro hac vice)
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/s/ Neil F. Letren *

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Pro Se Plaintiff (*signed by Alan Schoenfeld with the permission of Neil Letren)

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2016, the foregoing Joint Initial Status Report was served by overnight mail and email upon:

Neil F. Letren 105 E. Mill Avenue Capital Heights, MD 20743 Telephone: (240) 838-6601 neilletren@msn.com

Pro Se Plaintiff

/s/ Alan Schoenfeld
Alan Schoenfeld (pro hac vice)